

Pro Se 1 (Rev. 12/16) Complaint for a Civil Case

UNITED STATES DISTRICT COURT

for the

Western District of Oklahoma

FILED

MAY 05 2021

CARMELITA REEDER SHINN, CLERK
U.S. DIST. COURT, WESTERN DIST. OKLA.
BY mt DEPUTYAllen, Rodney L

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

City of Mangum "see attached"

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Case No.

CIV-21-446-D

(to be filled in by the Clerk's Office)

Jury Trial: (check one) ☐ Yes ☐ No

COMPLAINT FOR A CIVIL CASE

I. The Parties to This Complaint

A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name

Street Address

City and County

State and Zip Code

Telephone Number

E-mail Address

Allen, Rodney L215 S. LouisianaMangum, Greer CoOklahoma, 73554580-567-0288

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Defendant No. 1

Name
 Job or Title *(if known)*
 Street Address
 City and County
 State and Zip Code
 Telephone Number
 E-mail Address *(if known)*

City of Mangum
 City Hall
 201 N. Oklahoma Ave.
 Mangum, Greer
 Oklahoma, 73554
 (580) 782-2250

Defendant No. 2

Name
 Job or Title *(if known)*
 Street Address
 City and County
 State and Zip Code
 Telephone Number
 E-mail Address *(if known)*

Scott, Mary Jane
 Mayor
 414 S. Robinson.
 Mangum, Greer
 Oklahoma, 73554
 mj.scott1972@gmail.com

Defendant No. 3

Name
 Job or Title *(if known)*
 Street Address
 City and County
 State and Zip Code
 Telephone Number
 E-mail Address *(if known)*

Scott, Paxton
 Chief of Police
 105 S. Pennsylvania
 Mangum Greer
 Oklahoma 73554
 (580) 782-3382

Defendant No. 4

Name
 Job or Title *(if known)*
 Street Address
 City and County
 State and Zip Code
 Telephone Number
 E-mail Address *(if known)*

Miller, Brandon
 Police Officer
 105 S. Pennsylvania
 Mangum, Greer
 Oklahoma, 73554
 (580) 782-3382

Cont →

Pro Se 1 (Rev. 12/16) Complaint for a Civil Case

Defendant No. ⑤

Name

Job or Title *(if known)*

Street Address

City and County

State and Zip Code

Telephone Number

E-mail Address *(if known)*

Ditmore, Brandon (BS)
Police Officer
105 S. Pennsylvania
Mangum, Greer
Oklahoma, 73554
(580) 782-3382

Defendant No. 2

Name

Job or Title *(if known)*

Street Address

City and County

State and Zip Code

Telephone Number

E-mail Address *(if known)*

Defendant No. 3

Name

Job or Title *(if known)*

Street Address

City and County

State and Zip Code

Telephone Number

E-mail Address *(if known)*

Defendant No. 4

Name

Job or Title *(if known)*

Street Address

City and County

State and Zip Code

Telephone Number

E-mail Address *(if known)*

II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? (check all that apply)



Federal question



Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

4th, 6th, 8th & 14th Amendment Rights of The Constitution

B. If the Basis for Jurisdiction Is Diversity of Citizenship**1. The Plaintiff(s)****a. If the plaintiff is an individual**

The plaintiff, (name) _____, is a citizen of the
State of (name) _____.

b. If the plaintiff is a corporation

The plaintiff, (name) _____, is incorporated
under the laws of the State of (name) _____,
and has its principal place of business in the State of (name) _____.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

2. The Defendant(s)**a. If the defendant is an individual**

The defendant, (name) _____, is a citizen of
the State of (name) _____. Or is a citizen of
(foreign nation) _____.

Pro Se 1 (Rev. 12/16) Complaint for a Civil Case

b. If the defendant is a corporation

The defendant, (name) _____, is incorporated under
 the laws of the State of (name) _____, and has its
 principal place of business in the State of (name) _____.
 Or is incorporated under the laws of (foreign nation) _____,
 and has its principal place of business in (name) _____.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because *(explain)*:

\$ 5,000,000.00 Five Million US Dollars

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

"See attached"

IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

III Statement of Claim

- 1.) On 1-13-21 at 12:30 - 2:30 AM located at 228 S. Louis title Mangum, OK 73554 "Plaintiff's Residence" Mangum Police Officer "Brandon Miller" of the City of Mangum, Greer County Oklahoma and his partner ripped off the rear door with a steel bar, pointing tazer's through crack of rear door and entered home without search warrant, taking personal belongings & setting fire to Plaintiff's home in order to "smoke out" Plaintiff to serve arrest warrant for "failure to appear" leaving Plaintiff in burning home. Plaintiff suffered severe injuries due to forcing himself out of burning structure.
- 2.) On 1-13-2021 at 12:30 - 2:30 AM located at 228 S. Louis Title Mangum, OK 73554 "Plaintiff's Residence" Mangum Police Officer "Brandon Ditmore" of the City of Mangum, Greer County Oklahoma and his partner ripped off the rear door with a steel bar, pointing tazer's through crack of rear door and entered home without search warrant, taking personal belongings & setting fire to Plaintiff's home in order to "smoke out" Plaintiff to serve arrest warrant for "failure to appear" leaving Plaintiff in burning home. Plaintiff suffered severe injuries due to forcing himself out of burning structure.

III Statement of Claim

- 3.) On 1-14-2021 at 12:00pm located in Mangum, OK 73554 in the City of Mangum, Greer County Oklahoma Plaintiff contacted the Mayor Marry Jane Scott of the City of Mangum via facebook messenger asking for help placing protective order and placing charges on officers Miller and Ditmore. Mayor Scott stated via facebook "I am sorry about your house burning and I don't know if I would if I could help you."
- 4.) During or after the week of 1-14-2021 located at 105 S. Pennsylvania, Mangum Oklahoma at the Mangum Police Dept. Mangum Police Chief Scott Paxton refuses to disipline officers Miller & Ditmore. Mangum Police Chieff Scott Paxton fired Officer Rusty Rippetoe of 12139 N. 1870 RD, Sayre OK 73662 for contacting the OSBI on the Plaintiff's behalf.

I V. Relief

- 1.) Plaintiff is ~~requesting~~ "requesting" the Court to award \$5,000,000.00 "5 million" US Dollars for actual and punitive damages.
- 2.) Mangum Police Dept of the City of Mangum is continuing to harass the Plaintiff by placing bogus charges on the Plaintiff in order to "sweep Plaintiff under the rug" violating the Plaintiffs' Rights.
- 3.) \$2,000,000.00 "2 million" US Dollars
Constitution Rights Violations
- 4.) \$1,000,000.00 "1 million" US Dollars
Psychical & Emotional Damages
- 5.) Material Damages & lose
\$2,000,000.00 "2 million" US Dollars
- 6.) Requesting the Court to Award the amount of \$5,000,000.00 tax free to Rodney L. Allen of Mangum, OK 73554.

see Attached \$5,000,000⁰⁰ Five Million US Dollars

V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 5/3/2021

Signature of Plaintiff

Printed Name of Plaintiff

Rodney L Allen

Rodney L Allen

B. For Attorneys

Date of signing: _____

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Street Address

State and Zip Code

Telephone Number

E-mail Address